KYWD Facility ID No.: 24583 Application for Minor Modification February 2019

By this application, KYWD seeks to modify its transmitter location to that specified in a previous permit application, BPH-20141014ABL, which was for an upgrade of the channel class of KYWD from A to C3. At present KYWD is operating on the "presumptive STA" afforded prior facilities. This application specifies the same facilities as that permit, except for the change to a non-directional antenna made possible by a change in the domestic allocation situation, and a minor change in location of approximately 20 meters distance to match a new ASR that was issued for a replacement tower at the same site with more precise geographic coordinates.

Attached as **Figure 1** is a spacing study conducted at the proposed antenna location, which includes all known facilities, applications and allocations, both domestic and foreign. This Figure confirms that the proposed KYWD C3 antenna location for Green Valley, Arizona will be fully spaced in accordance with Section 73.207 with all current and proposed domestic allocations and facilities, but is short to the Mexican allocation at Agua Prieta, Sonora, Mexico. As there is no change in the contour distance to the allocation at Agua Prieta as demonstrated in **Figure 2**, concurrence of the country of Mexico is thought to be not required for this application.

In **Figure 3** a map of predicted principal community signal is demonstrating that the KYWD principal community will receive the required level of signal for more than 80% of its area and or population, thus is in material compliance with the rules.

The proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

The proposed 10-bay, half-wave-spaced "Rototiller" style antenna system, LPX-10AC-HW, is to be mounted 129.5 meters above ground level. The FM Model program was set to calculate values for an array of EPA type-3 "Rototiller" type of antenna elements mounted with half-wave spacing, operated with an effective radiated power of 25.0 Kilowatts in both the horizontal and vertical polarities. At 2 meters above the surface, at 407 meters from the base of the tower, this proposal will contribute worst case, 0.4 microwatts per square centimeter, or 0.04 percent of the allowable ANSI limit for controlled exposure, and 0.2 percent of the allowable limit for uncontrolled exposure.

It is therefore believed that this proposal is in compliance with OET Bulletin Number 65 as required by the Federal Communications Commission.

Further, the applicant will see that signs continue to be posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.

Figure 1. KYWD Class C3 Antenna Location Spacing Study

KYWD as Non D
Capstar Tx, Llc, As Debtor In Possession

REFERENCE
32 00 11.5 N.
110 47 48.8 W.

CLASS = C3 Int = B1
Current Spacings to 3rd Adj.

DISPLAY DATES
DATA 02-27-19
SEARCH 02-27-19

Channel 246 - 97.1 MHz

Call	Channel		Location		Azi	Dist	FCC	Margin
KYWD	CP -Z	246C3	Green Valley	AZ	173.3	0.02	152.5	-152.5
KYWD	LIC	246A	Green Valley	AZ	264.3	28.89	141.5	-112.6
AL6430	VAC	247B	Agua Prieta	SO	123.2	140.33	145.0	-4.7
KSZR	RSV-A	248C3	Oro Valley	AZ	325.6	43.90	42.5	1.4
KSZR	APP-D	248C3	Oro Valley	AZ	325.6	43.90	42.5	1.4
KSZR	LIC	248A	Oro Valley	AZ	325.6	43.90	41.5	2.4
XHNGSFM	USE	244B	Nogales	SO	190.6	76.11	71.0	5.1
XHNGSFM	OPE	244B	Nogales	SO	191.5	77.57	71.0	6.6
KMXP	LIC	245C	Phoenix	AZ	321.7	189.27	175.5	13.8
KAVV	LIC	249A	Benson	AZ	91.1	59.01	41.5	17.5
KFMR	CP -Z	247C1	Virden	NM	54.1	169.89	143.5	26.4
XHNOSFM	USE	248A	Nogales	SO	190.6	76.11	48.0	28.1
XHNOSFM	OPE	248A	Nogales	SO	190.6	76.11	48.0	28.1
KIKO-FM	CP -D	243C	Claypool	AZ	358.8	142.60	95.5	47.1
R17741	VAC	247A	Imuris	SO	182.4	136.32	88.0	48.3
AL6485	---	247B	Sonoita	SO	265.9	194.77	145.0	49.8
KCKO	LIC-D	300A	Rio Rico	AZ	190.1	68.50	11.5	57.0
R12304	ADD	249A	Sells	AZ	261.2	101.90	41.5	60.4
AL0971	VAC	246C	Hermosillo	SO	182.8	325.96	259.0	67.0
XHSEAFM	OPE	249A	Cananea	SO	156.9	122.91	48.0	74.9
XHSEAFM	USE	249A	Cananea	SO	157.6	124.05	48.0	76.1
KIKO-FM	LIC	243C2	Claypool	AZ	358.8	142.60	55.5	87.1

Reference station has protected zone issue: Mexico
RSV-R = reserved - needs protection, RSV-A = allocation
All separation margins include rounding

Figure 2. Contour Protection to Mexico

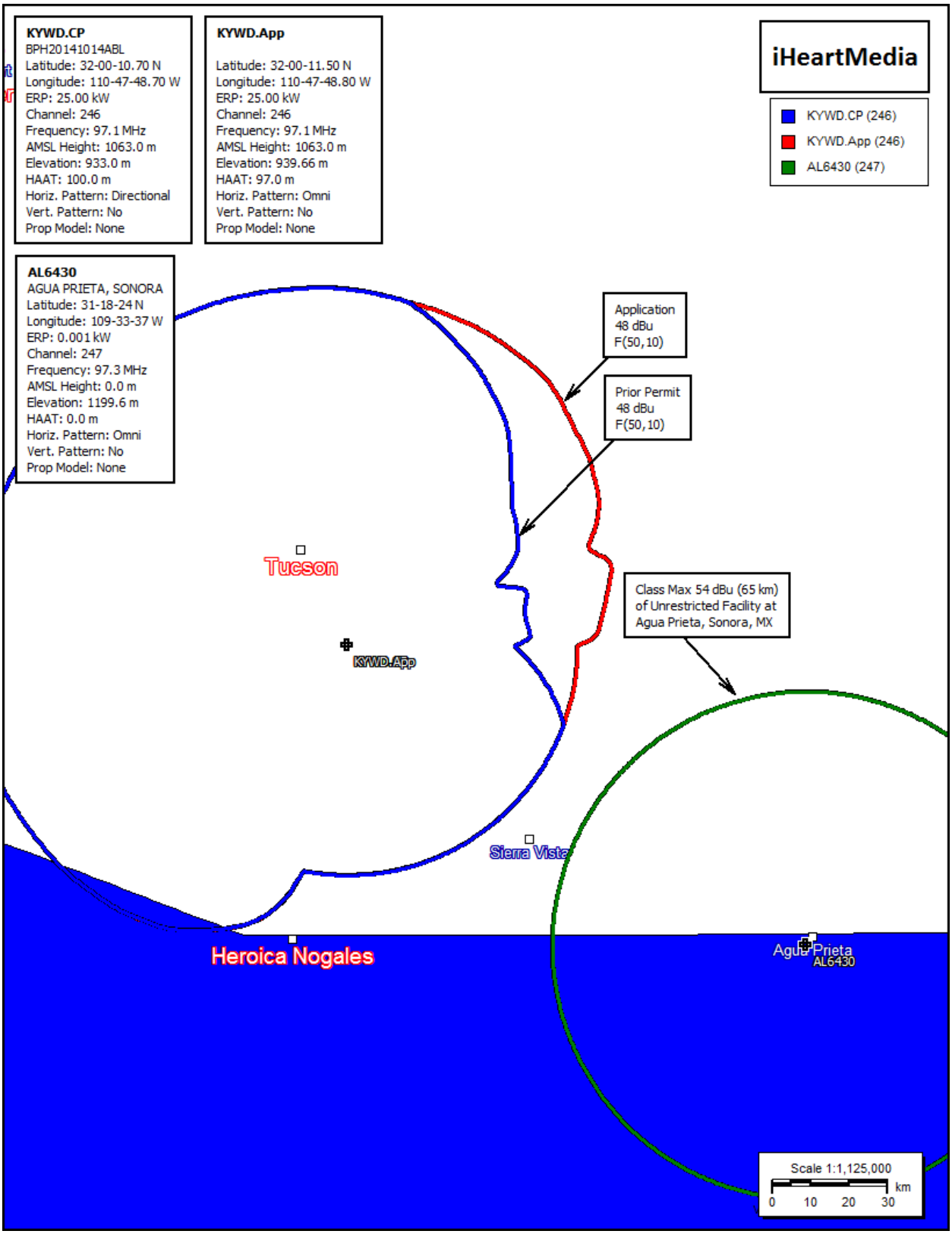

Figure 3. Antenna Location 70 dBu Contour Map